CM/CRC: USAO 2023R00167

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND



UNITED STATES OF AMERICA

CRIMINAL NO. TDC 03CROOTG

ANOMAH NDONWI,

v.

a/k/a "Louis Enow Ndikum," a/k/a "Njoku Enow Emmanuel,"

(False Use of Passport, 18 U.S.C. § 1543; Forfeiture, 18 U.S.C.

§§ 982(a)(6)(A), 982(b)(1), 21 U.S.C.

§ 853(p))

Defendant

INDICTMENT

COUNT ONE

(False Use of Passport)

The Grand Jury for the District of Maryland charges that:

On or about February 1, 2022, in the District of Maryland, the defendant,

ANOMAH NDONWI,

a/k/a "Louis Enow Ndikum," a/k/a "Njoku Enow Emmanuel,"

willfully and knowingly used, and attempted to use, and furnished to another for use a false, forged, counterfeited, mutilated, and altered passport and instrument purporting to be a passport, in that the defendant presented a document falsely purporting to be a passport issued by the Republic of Cameroon to a financial institution to open a banking account.

18 U.S.C. § 1543

COUNT TWO (False Use of Passport)

The Grand Jury for the District of Maryland further charges that:

On or about April 6, 2022, in the District of Maryland, the defendant,

ANOMAH NDONWI, a/k/a "Louis Enow Ndikum," a/k/a "Njoku Enow Emmanuel,"

willfully and knowingly used, and attempted to use, and furnished to another for use a false, forged, counterfeited, mutilated, and altered passport and instrument purporting to be a passport, in that the defendant presented a document falsely purporting to be a passport issued by the Republic of Cameroon to a financial institution to open a banking account.

18 U.S.C. § 1543

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(6)(A) and (b)(1) and 21 U.S.C. § 853(p) in the event of the defendant's conviction of the offenses alleged in Count One and Count Two of this Indictment.

Passport Fraud Forfeiture

2. Upon conviction of the offenses alleged in Count One and Count Two of this Indictment, the Defendant,

ANOMAH NDONWI, a/k/a "Louis Enow Ndikum," a/k/a "Njoku Enow Emmanuel,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6)(A):

- a. any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offenses;
- b. any property real or personal—that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses; or that is used to facilitate or is intended to be used to facilitate, the commission of the offenses.

Substitute Assets

- 3. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

18 U.S.C. § 982(a)(6)(A) 18 U.S.C. § 982(b)(1) 21 U.S.C. § 853(p)

Erek L. Barron

Erek L. Barron United States Attorney

A TRUE BILL

SIGNATURE REDACTED

3/2/2023 Date